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UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-2(c)

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In Re:

RONALD BRODIE,

Debtor.

The solution of New York and State of New Yo

Order Filed on July 19, 2019 by Clerk U.S. Bankruptcy Court District of New Jersey

Case No.: 19-21672/ABA

Hearing Date: 7/12/19 Judge: Altenburg

CONSENT ORDER VOIDING JUDICIAL LIENS OF LANDMARK GROWTH CAPITAL PARTNERS, L.P., LANDMARK IAM GROWTH CAPITAL, L.P., FLASTER GREENBERG, P.C. AND NOBLE OPPORTUNITY FUND II L.P.

The relief set forth on the following pages, numbered two (2) through four (4) is hereby **ORDERED**.

DATED: July 19, 2019

Honorable Andrew B. Altenburg, Jr. United States Bankruptcy Court Case 19-21672-ABA Doc 52 Filed 07/19/19 Entered 07/19/19 08:39:06 Desc Main

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Case No.: 19-21672/ABA Debtor(s): Ronald Brodie

Caption of Order: CONSENT ORDER VOIDING JUDICIAL LIENS OF LANDMARK GROWTH CAPITAL PARTNERS L.P., LANDMARK IAM GROWTH CAPITAL, L.P., FLASTER GREENBERG, P.C. AND NOBLE

OPPORTUNITY FUND II L.P.

THIS MATTER having been opened to the Court by David A. Kasen, Esquire, of Kasen & Kasen, attorneys for the above-named debtor, pursuant to a Notice of Motion seeking an Order voiding the judicial liens of Landmark Growth Capital Partners, L.P., Landmark IAM Growth Capital, L.P., Flaster Greenberg, P.C. and Noble Opportunity Fund II, L.P. and pursuant to an Application and Order Shortening Time and it appearing that no opposition to the Motion was filed by Flaster Greenberg, P.C. and Noble Opportunity Fund II, L.P. and it further appearing that opposition to the Motion was filed by Landmark Growth Capital Partners, L.P. and Landmark IAM Growth Capital, L.P. by Joel R. Glucksman, Esq. and it further appearing that the Debtor and Landmark Growth Capital Partners, L.P. and Landmark IAM Growth Capital, L.P. have resolved their differences as set forth in this Consent Order and it further appearing that at the hearing before the Court, the Court found that the formula for impairing an exemption by the aforesaid judicial liens as set forth in § 522 (f)(2) has been met, and for good cause shown;

IT IS HEREBY ORDERED that the judicial lien of Landmark Growth Capital Partners, L.P., which encumbers 810 Joshua Court, Moorestown, New Jersey 08057, by virtue of the Judgment docketed in the Superior Court of New Jersey, Law Division, Burlington County, Judgment No. J-220003-2016, entered on November 22, 2016 in favor of Landmark Growth Capital Partners, L.P., and against Ronald Brodie, in the amount of \$731,246.10, plus attorney's fees of \$18,268.39, plus costs of \$340.00 is void

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Case No.: Debtor(s):

19-21672/ABA Ronald Brodie

Caption of Order: CONSENT ORDER VOIDING JUDICIAL LIENS OF LANDMARK GROWTH CAPITAL PARTNERS L.P., LANDMARK IAM

GROWTH CAPITAL, L.P., FLASTER GREENBERG, P.C. AND NOBLE

OPPORTUNITY FUND II L.P.

as to Ronald Brodie, pursuant to § 522(f) of the Bankruptcy Code.

IT IS FURTHER ORDERED that the judicial lien of Landmark IAM Growth

Capital, L.P., which encumbers 810 Joshua Court, Moorestown, New Jersey 08057, by

virtue of the Judgment docketed in the Superior Court of New Jersey, Law Division,

Burlington County, Judgment No. J-220003-2016, entered on November 22, 2016 in

favor of Landmark IAM Growth Capital, L.P., and against Ronald Brodie, in the amount

of \$348,240.19, plus attorney's fees of \$8,715.94, plus costs of \$340.00 is void as to

Ronald Brodie, pursuant to § 522(f) of the Bankruptcy Code.

IT IS FURTHER ORDERED that the judicial lien of Flaster Greenberg, P.C.,

which encumbers 810 Joshua Court, Moorestown, New Jersey 08057, by virtue of the

Judgment docketed in the Superior Court of New Jersey, Law Division, Camden County,

Judgment No. J-133147-2017, entered on August 14, 2017 in favor of Flaster Greenberg,

P.C., and against Ronald Brodie, in the amount of \$65,792.24, is void as to Ronald

Brodie, pursuant to § 522(f) of the Bankruptcy Code.

IT IS FURTHER ORDERED that the judicial lien of Noble Opportunity Fund II,

L.P., which encumbers 810 Joshua Court, Moorestown, New Jersey 08057, by virtue of

the Judgment docketed in the Superior Court of New Jersey, Law Division, Burlington

County, Judgment No. J-195439-2018, entered on November 17, 2018 in favor of Noble

Opportunity Fund II, L.P., and against Ronald Brodie and others, in the amount of

\$1,504,361.84, is void as to Ronald Brodie only, pursuant to § 522(f) of the Bankruptcy

Code.

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We hereby consent to the form and entry of the within Consent Order.

KASEN & KASEN, Attorneys for Ronald Brodie, Debtor

/s/ David A. Kasen

By: DAVID A. KASEN, ESQ.

SCARINCI & HOLLENBECK, Attorneys for Landmark Growth Capital Partners, L.P. and Landmark IAM Growth Capital, L.P.

/s/ Joel R. Glucksman

By: JOEL R. GLUCKSMAN, ESQ.